THE SETTING OF THE ANNUAL SUBSISTENCE HARVEST TAKE RANGES OF NORTHERN FUR SEALS ON THE PRIBILOF ISLANDS FOR THE PERIOD 2000-2002

DRAFT ENVIRONMENTAL ASSESSMENT

June 2000

Lead Agency: **National Oceanic and Atmospheric Administration**
National Marine Fisheries Service
Alaska Region
Juneau, Alaska

Responsible Official: **James W. Balsiger**
Regional Administrator

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Abstract: Regulations at 50 CFR 216.72(b) require the Assistant Administrator for Fisheries to determine and publish the take ranges for the Pribilof Islands subsistence harvest of northern fur seals every three years. The purpose of this proposed action is to set the annual Pribilof Islands fur seal subsistence take ranges for the period 2000-2002 as required by regulations. This action establishes the number of northern fur seals on the Pribilof Islands that may be taken by Alaskan Native (Aleut) residents annually for the three year period 2000-2002. This action maintains the same take ranges that were established for the previous three year period 1997 - 1999. These ranges, through close consultation with the tribal governments of St. Paul and St. George Islands, have been determined as adequate to meet the local subsistence needs for northern fur seals.

The ranges have been determined through previous consultations with the residents of St. Paul and St. George Islands, Pribilof Islands. The action is not considered controversial.

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ABBREVIATIONS AND ACRONYMS

ANO	**Alaskan Native Organization**
CFR	**Code of Federal Regulations**
CZMA	**Coastal Zone Management Act**
EA	**Environmental Assessment**
EPA	**Environmental Protection Agency**
ESA	**Endangered Species Act, as amended**
FONSI	**Finding of No Significant Impact**
FSA	**Fur Seal Act**
MMPA	**Marine Mammal Protection Act**
NEPA	**National Environmental Policy Act**
NMFS	**National Marine Fisheries Service**
NOAA	**National Oceanic and Atmospheric Administration**

SUMMARY

Description of the Proposed Action

The commercial harvesting of northern fur seals *Callorhinus ursinus* on the Pribilof Islands, Alaska, was first pursued shortly after the discovery of the Islands in 1786. The commercial harvest was continued by the United States when the Pribilof Islands came under U.S. jurisdiction with the purchase of Alaska from Russia in 1867. On October 14, 1984, the Interim Convention on the Conservation of Northern Fur Seals, which authorized the commercial harvest, expired and the U.S. Congress failed to ratify a new treaty extension. Since domestic law did not provide for a commercial harvest of marine mammals in the U.S., the commercial harvest of northern fur seals was terminated.

On July 9, 1985, the National Marine Fisheries Service (NMFS) published an emergency interim rule to govern the subsistence taking of fur seals by Alaskan Native (Aleut) residents of the Pribilof Islands under authority of section 105(a) of the Fur Seal Act (FSA). A final rule was subsequently published on July 9, 1986 (51 FR 24828). The subsistence harvest of northern fur seals on the Pribilof Islands is governed by regulations at 50 CFR 216 Subpart F--Pribilof Islands, Taking for Subsistence Purposes. These regulations were published under the authority of the Fur Seal Act (FSA), 15 U.S.C. 1151 et seq., and the Marine Mammal Protection Act (MMPA), 16 U.S.C. 1361 et seq. (see 51 FR 24828, July 9, 1986).

Prior to the 1994 subsistence harvest, NMFS, in cooperation with the tribal governments of each island, conducted an annual household survey of the local subsistence communities to estimate the number of seals required to meet their subsistence needs for that year. NMFS would then publish the proposed estimates in the Federal Register for comment prior to finalizing the number of seals that could be taken on each island. These estimates were set for each island and consisted of a lower and upper range.

On May 13,1994, NMFS published a proposed rule to change the manner in which the harvest take ranges were established by setting the ranges for a 3-year period rather than annually. The reason for this change was that the annual household survey of subsistence needs regarding fur seals was time consuming, regarded as intrusive by some local residents, and because not all households could be contacted. Therefore, the survey did not provide a level of accuracy commensurate with the difficulties associated with the survey effort. As the number of seals taken for subsistence purposes had been relatively stable and consistent each year since 1989 (Table 1), it was determined that setting the ranges for a 3-year period would be a more cost effective and as satisfactory an approach as the annual process. A final rule was published on July 12, 1994 (59 FR 35471) setting the ranges for the period 1994-1997 at the same levels as had been established for the 1992 and 1993 harvests.

In September 1996, NMFS requested that the tribal government of each island determine the number of fur seals that would be needed by their communities each year for the 3-year period

1997 through 1999. The response from the St. Paul Island Tribal Government was to maintain the current range of 1,645-2,000 seals. The St. George Island tribal government requested that the lower end range be increased from 281 to 300 seals and that the upper bound remain at 500 seals.

The current proposed action is to set the annual Pribilof Islands fur seal subsistence take ranges for the period 2000 - 2002 as required by regulations at 50 CFR 216.72(b). This action continues the process described above and will establish the number of seals that may be taken by Alaskan Native (Aleut) residents annually for the three year period 2000 - 2002 on the Pribilof Islands. This is a "status-quo" proposed action that proposes no changes and maintains the same take ranges as were established for the previous three year period 1997 - 1999. These levels of take have been determined as adequate to meet the local subsistence needs for northern fur seals.

Summary of Major Environmental Impacts

The preferred alternative will set the number of fur seals to be taken for subsistence purposes on St. Paul Island at the current level of 1,645-2,000 seals. The preferred alternative will set the number of fur seals to be taken for subsistence purposes on St. George Island at the current level of 281-500 seals. These are the same estimates for the 1997-1999 period. Therefore, there will not be any additional impacts on this activity from this action from the status-quo..

Areas of Controversy

The current subsistence harvest of northern fur seals on the Pribilof Islands is not considered controversial.

Required Actions or Approvals

The preferred alternative will result in the authorization of an estimate (range) of northern fur seals that can be taken for subsistence purposes on St. Paul and St. George Islands, Pribilof Islands. No further actions or approvals are required.

1.0 BACKGROUND - DEPLETED DETERMINATION

Northern fur seals were possibly near their carrying capacity between 1940 and 1956 when peak numbers of animals were seen on the Pribilof Islands. The harvest of approximately 300,000 females from 1956 to 1968 reduced the stock, and resulted in a decrease in pup production. The reduction in the numbers of females probably accounted for 70 percent of the subsequent reduction in pup production; the remaining 30 percent was perhaps a result of unidentified external or environmental factors (NMFS 1993). In the absence of a female commercial harvest, the population increased until 1976, but then declined from unknown causes.

The commercial harvest of juvenile seals from 1976 to 1984 (the year commercial harvesting ended) ranged from 21,000 to 28,000 per year. Because these harvests were on juvenile males only, and because the take was small relative to pup production (about 10-15 percent, this selective harvest did not cause the decline (NMFS 1993)

The MMPA defines a species, population, or stock as depleted if it falls below its optimum sustainable population (OSP). The lower bound of OSP for northern fur seals is thought to be at least 60% of the carrying capacity level. The Pribilof Islands population was designated depleted because it declined to less than 50 percent of levels observed in the late 1950s and there was no compelling evidence that carrying capacity has changed substantially since the late 1950s. The most likely causes of the decline of fur seals has been the harvest of adult females from 1956 to 1968, and lower survival of juveniles and adult females at sea since 1975. Emigration did not contribute to the decline because the species has declined in total numbers throughout its range.

On 17 June 1988, NMFS declared the Pribilof Islands (St. Paul and St. George Islands) stock of northern fur seals *Callorhinus ursinus* depleted under the MMPA. Amendments to the MMPA passed into law on 23 November 1988 (P.L. 100-711) direct the Secretary of Commerce to develop a conservation plan on northern fur seals for "conserving and restoring the species or stock to its optimum sustainable population." The amendments further specify that the plan include information on the status of fur seals on the Pribilof Islands, causes of declines, threats to the species, critical information gaps, and recommended research and management actions for meeting the objectives of the plan. As a result of this action, the NMFS published the Conservation Plan for the Northern Fur Seal (Conservation Plan) in June, 1993.

1.1 Purpose and Need for Action

Regulations at 50 CFR 216.72(b) require the Assistant Administrator for Fisheries to determine and publish the take ranges for the Pribilof Islands subsistence harvest of northern fur seals every three years. Therefore, the purpose of this proposed action is to set the annual Pribilof Islands fur seal subsistence take ranges for the period 2000-2002 as required by regulations.

The Assistant Administrator for Fisheries, NMFS, is required to terminate the harvest when it is

determined that the subsistence needs of each community have been met, or on August 8, whichever occurs first. When the lower range for either island is met, the Assistant Administrator for Fisheries suspends the harvest on that island for not more than 48 hours, during which the harvest data will be reviewed to determine if the subsistence needs of the community have been met. If it is determined that the needs have not been met, the Assistant Administrator for Fisheries must provide a revised estimate of the number of seals required to meet the remaining needs of the community and the harvest can then be resumed, not to exceed upper range number for that island or the August 8 termination date, whichever comes first.

The Assistant Administrator for Fisheries is also required to terminate the harvest, even if the subsistence needs of the community have not been met, if it is determined that the harvest is being conducted in a wasteful manner. The subsistence harvest on each island is carefully monitored by onsite NMFS personnel to ensure that the harvest complies to the regulations. An annual report describing the conduct of the harvest is completed and submitted to the agency following each harvest season.

2.0 ALTERNATIVES INCLUDING THE PREFERRED ALTERNATIVE

The following two alternatives have been identified regarding this action:

Alternative 1: Propose that the annual take ranges for the subsistence harvest of northern fur seals on the Pribilof Islands be set at levels different from those first established in 1997.

Alternative 2 - Status Quo: Propose that the annual take ranges for the subsistence harvest of northern fur seals on the Pribilof Islands be set at the same levels as those established in 1997. This is the Preferred Alternative by NMFS.

2.1 Description of Alternatives

2.1.1 Alternative 1: Setting the take ranges at levels other than those first established in 1997.

Setting subsistence take ranges, either greater or lesser, than those established in 1997 would require NMFS to make a unilateral determination as to the estimated subsistence needs of the Pribilof communities of St. Paul and St. George Islands. This determination would be independent from, and contrary to, the levels agreed upon as a result of numerous discussions and negotiations with the tribal governments who represent the collective interests of the tribal residents of those communities.

To take this action NMFS would need a rational management or scientific basis to do so. As required by the Conservation Plan, NMFS scientific research on the Pribilofs includes frequent studies and analyses of northern fur seal population levels and dynamics. The results of this research have consistently established population levels high enough to accommodate the

continued subsistence harvest at the levels identified in the proposed action. Practical management experience regarding the harvest since 1986 has clearly demonstrated that the past and harvest take ranges, as determined by the process described elsewhere in this document, have not adversely affected the northern fur seal population and have adequately met the annual subsistence needs of the local communities.

Further, pursuing this alternative without any documented indication of adverse effects of the subsistence harvest on the northern fur seal might be considered contrary to the co-management policy established by section 119 of the MMPA. Under this policy NMFS can establish cooperative agreements with Alaska Native Organizations (ANO's), including tribal governments regarding the uses of marine mammals taken by Alaskan Natives for subsistence purposes.

As described in the proposed action, NMFS has a long and very involved history regarding the Aleut residents of the Pribilof Islands and the northern fur seal stock, including recent implementation of the co-management process with the respective local tribal governments of the Islands. This history clearly establishes a unique relationship between the local communities of the Pribilof Islands and NMFS. Since the termination of the commercial fur seal harvest there has been established a cooperative working relationship between the Aleuts and NMFS which has resulted in effective management of the subsistence harvest of fur seals on the Pribilof Islands. Among those refinements have been a more stable and consistent level of take and increased utilization of harvested seals.

Considering that NMFS has no data or other information that would indicate the subsistence harvest of fur seals on the Pribilofs is having any significant impact or adverse consequence to the northern fur seal species, and placing high value on the positive and promising relationship between the federal and tribal governments regarding the Pribilofs, this alternative was not selected as preferred.

2.1.2 Alternative 2 - Status Quo

This alternative continues the established process and agreed upon take levels that have occurred since 1997. It also supports the beneficial relationship between NMFS and the local tribal governments regarding the management and conduct of the subsistence harvest of fur seals on the Pribilof Islands. Based on historic take levels, current scientific data and collective traditional knowledge regarding subsistence needs of the respective communities, take ranges have been established that are cooperatively determined by NMFS and local tribal governments.

This approach is fully supported by a long history of federal involvement in the Pribilofs regarding the northern fur seal species and local human communities, and fully complies with the prevailing policy of co-management as established by section 119 of the MMPA. This alternative is considered to be the most appropriate and therefore, is preferred and recommended for approval.

2.1.2.1 Description of the Subsistence Harvest of Northern Fur Seals on the Pribilof Islands

Table 1 summarizes the subsistence take ranges and actual harvest levels since the authorization of the subsistence harvest in 1985. The number of northern fur seals harvested on St. Paul Island since 1986 has ranged from 1,000 (1999) to 1,710 (1987) (Table 1). The annual subsistence takes on St. George Island since 1986 have ranged from 92 (1987) to 319 (1993) seals (Table 1). The actual number of animals harvested has never reached the upper end of the estimated take range and has reached the lower range only once on St. Paul (1991) and twice on St. George (1991, 1993) in the past 10 years (1989-1999). The average number of seals harvested during the past 10 years on St. Paul and St. George Islands has been 1,524 (range: 1,000 to 1,645) and 247 (range: 193 to 319), respectively.

Table 1. Subsistence Harvest Levels for Northern Fur Seals on the Pribilof Islands, 1985-1999.

	Subsistence Take Ranges		Actual Harvest Levels	
Year	St.Paul	St.George	St.Paul	St.George
1985	--	--	3,384	329
1986	2,400-8,000	800-1,800	1,299	124
1987	1,600-2,400	533-1,800	1,710	92
1988	1,800-2,200	600-740	1,145	113
1989	1,600-1,800	533-600	1,340	181
1990	1,145-1,800	181-500	1,077	164
1991	1,145-1,800	181-500	1,645	281
1992	1,645-2,000	281-500	1,482	194
1993	1,645-2,000	281-500	1,518	319
1994	1,645-2,000	281-500	1,616	161
1995	1,645-2,000	281-500	1,525	260
1996	1,645-2,000	281-500	1,591	232
1997	1,645-2,000	300-500	1,153	227
1998	1,645-2,000	300-500	1,297	256
1999	1,645-2,000	300-500	1,000	**193**

2.2 Alternatives Considered but Rejected

2.2.1 No-action Alternative

As regulations at 50 CFR 216.72(b) require the Assistant Administrator to determine and publish the take ranges for the Pribilof Islands subsistence harvest of northern fur seals every three years, the "No Action" alternative is not available to NMFS. Besides violating current regulations, taking no action would likely create a situation in which NMFS would be responsible for a variety of other problems and hardships if the subsistence harvest was not permitted to proceed as permitted according to regulations at 50 CFR 216 Subpart F. Some examples would include significant deficiencies of nutritional and cultural value and corresponding increases in the unlawful taking of northern fur seals that previously were and should continue to be available to individual Alaskan Native subsistence users and the local communities they comprise.

3.O AFFECTED ENVIRONMENT

The U.S. Department of State asked the National Research Council (NRC) to study the available scientific and technical information on the Bering Sea ecosystem, focusing, in particular, on environmental factors that influence natural variability in populations of marine mammals, seabirds, and fish. The result of this effort was published in a volume entitled "The Bering Sea Ecosystem" by NRC in 1996. This document describes in great detail the marine geology, oceanography, and the primary and secondary production of the region, as well as the biological features of the Bering Sea and surrounding islands. These biological features include a discussion of the invertebrate, finfish, mammals, fish and birds, their population trends and the interactions and impacts of humans on these populations. This includes a discussion of the Pribilof Islands the the fur seal fishery. The volume also discusses the environmental variability in the Bering Sea ecosystem and the "cascade hypothesis" prevalent in discussions about the recent declines in many of the populations of the area. The reviewer is directed to NRC (1996) for a comprehensive review of the affected environment of this action.

Approximately 80% of the world population of northern fur seals (*Callorhinus ursinus*) breeds on the Pribilof Islands, Alaska. Annual studies of northern fur seals are carried out on the Pribilof Islands, Alaska during May to November. Areas of research include biennial population counts, subsistence harvest tissue collections, offspring condition, prey selection, incidence of entanglement, pup mortality and disease, as well as special studies of female foraging, and migration of pups. Research was conducted by National Marine Mammal Laboratory (NMML) staff, their contractors, and various collaborators including individuals and groups in the Aleut communities of St. Paul and St. George Islands, the Japanese National Research Institute of Far Seas Fisheries, University of California, and University of Alaska. Results of monitoring studies are published annually in the Alaska Fisheries Science Center's, NOAA, Technical Memorandum series, Fur Seal Investigations (FSI) report. Other studies appear in peer-reviewed journals.

Population counts are conducted on both St. Paul and St. George Islands during August in even years. The last published population estimates are for 1998. Population characteristics monitored in 1998 include the size of the subsistence harvest, counts of adult males, estimates of numbers of pups born, and mortality rates of fur seals pups on St. Paul and St. George Islands.

Crude estimates of the total fur seal abundance have been presented in the past (Loughlin et al. 1994). These estimates were calculated by multiplying the average number of pups born over the past 3 censuses by a correction factor of 4.47. That correction factor was derived from estimates of survival and fecundity (Loughlin et al. 1994) from data collected at sea during 1958-1974. Therefore, a strong assumption built into the estimate is that these vital rates are still valid. Since we cannot verify these assumptions, the estimate must be viewed only as a rough approximation. The estimate of the total stock for the Pribilof Islands population in 1998 is about 973,000 fur seals. The total stock size for the United States, which includes the Pribilof, Bogoslof, and San Miguel populations, is about 1,004,000 fur seals.

For full reference to the 1998 survey please refer to:

Robson, B.W. (Editor). 2000. Fur Seal Investigations, 1998. U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-113, 101p.

4.0 ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES

An environmental assessment (EA) is required by the National Environmental Policy Act of 1969 (NEPA) to determine whether the action considered will result in significant impact on the human environment. If the action is determined not to be significant based on an analysis of relevant considerations, the EA and resulting finding of no significant impact (FONSI) would be the only environmental documents required by NEPA. An environmental impact statement (EIS) must be prepared for major federal actions significantly affecting the human environment.

An EA must include a brief discussion of the need for the proposal, the alternatives considered, the environmental impacts of the proposed action and alternatives and a list of document preparers. The purpose and alternatives were discussed in Sections 1.1, 1.2 and 1.3 and the list of preparers is in Section 3.5. This section addresses the environmental impacts of the alternatives, including impacts on threatened or endangered species under the Endangered Species Act (ESA) and other species not covered by the ESA.

Generally, the environmental impacts of the commercial fur seal harvest on the Pribilof Islands have been well documented and are summarized in the conservation plan for the northern fur seal (NMFS 1993). The commercial harvest began shortly after the islands were discovered by Russian explorers in 1786 and lasted until 1984. In 1988 NMFS designated the Pribilof Islands stock of northern fur seals as depleted under the MMPA. This designation was the result, in

large part, of the large-scale commercial harvest during this 198 year period.. In 1985 the commercial harvest was terminated and the subsistence harvest by Aleut residents of the Islands was authorized.

Regulations governing the subsistence harvest are more restrictive regarding sex, size and age of harvested seals than those in effect during the years of the commercial harvest. Only subadult males between 2 and 4 years of age ,and greater than 124 centimeters in length, are allowed to be taken in the subsistence harvest. Between 1985 and 1999 the number of seals taken for subsistence purposes on the Pribilof Islands totaled 25,908 (from Table 1). This total number of seals taken in the subsistence harvest is only a small fraction, and arguably an insignificant level, relative to the number of seals taken previously in the commercial harvest. The subsistence take since 1985 is not considered responsible for the depleted determination.

4.1 Environmental Impacts of Alternative 1

Setting the take ranges at levels other than those first established and maintained during the 3-year period 1997-1999 would have a significant impact on the human environment and/or species of concern only if very high levels of take were authorized. However, regulations prohibiting unnecessary waste of the animals taken would preclude such authorization unless a corresponding high level of subsistence need can be justified. The well documented history of the subsistence fur seal harvest on the Pribilofs clearly indicates that this scenario is highly unlikely to occur and is not within the scope of the proposed action.

Setting the take ranges at levels lower than those established and maintained during the 3-year period 1997-1999 could possibly have an adverse impact on the human environment if the levels were such that the subsistence needs of the local communities were not adequately met. The economic and logistical difficulties associated with small, rural and remote Alaskan communities such as those of St. Paul and St. George Islands, create a situation wherein subsistence uses of marine mammals is an important source of food and a major component of the traditional character of the communities. Therefore, establishing take ranges that do not meet the subsistence needs of the local communities would impose a variety of significant hardships for individual residents and the community at large that could not be justified.

Establishing take levels for the subsistence fur seal harvest on the Pribilofs less than those previously authorized would not have any significant adverse impact on the northern fur seal population.

A unilateral decision by NMFS to establish such take ranges would be counter to current regulations implementing the MMPA, as well as the spirit of co-management established in section 119 of the MMPA. This would result in greater damage to the relationship between NMFS and the local ANOs, than benefit to the fur seal stock.

It is not known to what extent, if any, an increase in harvest level might impact the fur seal stock. All the harvested animals, with very few exceptions, are non-breeding males and therefore do not contribute to the population growth. The subsistence harvest of these sub-adult males is not thought to have any impact on the population growth rates and therefore an increase in numbers harvested, as long as it was on males within this age-group, would likely have a little, possibly, insignificant impact.

4.2 Environmental Impacts of Alternative 2

Establishing take ranges at the same levels as those for the period 1997-1999 maintains a status quo level of take that has evolved and stabilized through years of cooperatively managing the subsistence harvest of northern fur seals on the Pribilof Islands. The subsistence component of these communities has remained an important, consistent and supporting factor in the personal, economic and traditional character of the Pribilof Islands which NMFS and local tribal governments believe will be preserved by this alternative. For that reason, this is the preferred alternative by NMFS

It is not known to what extent, if any, an increase or decrease in harvest level might impact the fur seal stock. All the harvested animals, with very few exceptions, are non-breeding males and therefore do not contribute to the population growth. The subsistence harvest of these sub-adult males is not thought to have any impact on the population growth rates and therefore an increase or decrease in numbers harvested, as long as it was on males within this age-group, would likely have a little, possibly, insignificant impact. The preferred alternative does not change the harvest levels. These levels have been shown by various scientific analyses to have a negligible adverse impact to the northern fur seal population and is consistent with the management of the depleted status of the species as prescribed by the MMPA.

4.3 Impacts on Endangered or Threatened Species

The Endangered Species Act (ESA) establishes several levels of classification and criteria regarding the listing of wildlife species whose populations have reached levels warranting concern. Two of those levels are Threatened and Endangered. The northern fur seal species is not listed, or under consideration for listing, under the ESA and therefore, is not impacted by this action.

4.4 Coastal Zone Management Act of 1972 (CZMA)

Implementation of the preferred alternative would be conducted in a manner consistent, to the maximum extent practicable, with the Alaska Coastal Management Program within the meaning of Section 30 (c) (1) of the CZMA and its implementing regulations.

5.0 CONSULTATION AND COORDINATION

This action and the estimates of subsistence need contained herein are the product of annual surveys conducted by NMFS with the households of St. Paul and St. George Islands, and the Tribal Governments of St. Paul and St. George Island. The harvest process described herein have also been the product of considerable consultations and coordination between NMFS and the residents and governmental organizations on the islands.

6.0 CONCLUSIONS OR FINDING OF NO SIGNIFICANT IMPACT (FONSI)

Based on the selection of the preferred "status-quo" alternative (Alternative 2) regarding the setting of take ranges for the subsistence harvesting of northern fur seals on the Pribilof Islands for the period 2000 - 2002, NMFS has determined that the proposed action will neither significantly impact the overall quality of the human environment or cause any adverse impacts on any wildlife species listed under the ESA or MMPA, nor does it significantly modify or alter any findings or conclusions of previous environmental reviews under NEPA. Therefore, preparation of an environmental impact statement for the proposed action is not required by Section 102 (2) (C) of NEPA or its implementing regulations.

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Assistant Administrator for Fisheries, NOAA Date

7.0 REFERENCES

National Marine Fisheries Service. 1993. Final Conservation Plan for the Northern Fur Seal (Callorhinus ursinus). Prepared by the National Marine Mammal Laboratory/Alaska Fisheries Science Center, Seattle, Washington, and the Office of Protected Resources/National Marine Fisheries Service, Silver Spring, Maryland. 80 pp.

National Resource Council. 1996. The Bering Sea Ecosystem. Committee on the Bering Sea Ecosystem, Polar Research Board, Commission on Geo-sciences, Environment and Resources, National Research Council. National Academy Press. 307 pp.

8.0 LIST OF PREPARERS

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